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February 19, 2016

VIA ECF

Hon. Vernon S. Broderick United States District Judge United States Courthouse 40 Foley Square, Courtroom 518 New York, NY 10007

> Re: Vicente Bahena, et al. v. Park Avenue South Management LLC, et al. Case No. 15-cv-1507 (VSB)

Dear Judge Broderick:

We are outgoing counsel for Defendants Park Avenue South Management LLC, Gilanco Holdings LLC, 2500 ACP Partners LLC, Amsterdam Realty Partners LLC, Emo Realty Partners LLC, Maurice McKenzie, and Edward Ostad in the above-referenced action.

We write to advise the Court that Gilanco Holdings LLC is in the process of identifying and retaining new counsel.

As such, on behalf of Gilanco Holdings LLC, we write to join in the requests submitted by incoming counsel for Defendants Park Avenue South Management LLC, 2500 ACP Partners LLC, Amsterdam Realty Partners LLC, Emo Realty Partners LLC, Maurice McKenzie, and Edward Ostad (Docs. 95-96) seeking a stay of deadlines for sixty (60) days.

Respectfully submitted,
TARTER KRINSKY & DROGIN LLP

By: s/Richard L. Steer
Richard L. Steer

cc: All Counsel of Record (via ECF)